PART I
METHODOLOGICAL BASES
I. PURPOSE OF THE METHODOLOGICAL BASES

This document contains the theoretical and methodological ideas underpinning this accountability exercise by the Presidency of the Government of Spain, presented to the public on 29 December 2020.

These bases have been submitted to the scrutiny and consideration of a group of experts in different fields related to accountability and public policy analysis, constituted as a Methodological Analysis Group, in order to confirm the validity, applicability and accuracy of the methodology’s design.

Thanks to the Group’s discussions, the methodological bases used in the exercise presented here incorporate a great deal of the feedback from its members. The rest will be assessed in detail for incorporation, if possible, into future exercises of this kind.

Therefore, this is a process of continuous improvement in a context of constant revision, which will be expressed in the bases to be used in coming years.

The constitution and dynamics of the Methodological Analysis Group, as well as its conclusions and recommendations, are detailed in part II of this Appendix.

II. PRELIMINARY CONSIDERATIONS: THEORETICAL FRAMEWORK

1. Purpose of accountability exercises

History and political theory describe in great detail a key process for the configuration of our democratic system. The representation system replaced or supplemented the historically preceding imperative mandate, thus freeing representatives from the precise instructions of their constituents (which could be institutions or individuals) and also from accountability for direct non-compliance with those instructions. Under the representation system, representatives obtain the trust of their constituents, as well as a free, open mandate to manage and safeguard the interests of all their constituents in the most appropriate and favourable manner, with the aim of protecting the general interest.
At present, there seems to be a more or less generalized consensus that the representative mandate makes it possible to better address States' complex political action. However, it is just as important to emphasize that this system of government may eventually lead to a certain feeling of distance between those with that mandate and their voters; voters may feel that their interests have not been channelled or addressed properly, calling into question this critical feature of representativeness and, by extension, of democracy.

To mitigate this risk, accountability exercises are based on the recognition that the legitimacy of public decisions does not solely stem from the electoral process and from respect for and application of rules and procedures, but, rather, that it is necessary to strengthen the ties between constituents, representatives, and the executive branch.

Here, it is important to point out that accountability exercises taking place directly between the executive and the citizens involve conveying substantial information about the government’s work, and they supplement the different formally established mechanisms for government control.

2. What are accountability exercises?

In the academic and theoretical spheres, there are different definitions of accountability: the issue is not devoid of controversy, nor has it been resolved.

According to Schedler et al. (2004), “A is accountable to B when A is obliged to inform B about A’s actions and decisions, to justify them, and to suffer punishment in the case of eventual misconduct.”

This definition includes the two essential components of accountability. Firstly, answerability: making publicly available the data, arguments, and explanations regarding activity, both past and present, stemming from monitoring government actions. This results in the right to obtain an explanation, and, correspondingly, the obligation to provide it, as well as the right to receive said explanation and the duty to justify the exercise of power. Secondly, enforcement; i.e., the punitive dimension: authorities and officials must assume the consequences of non-compliance, including possible negative penalties.

Both of these dimensions of accountability may be present to varying degrees. However, an exercise must always contain the basic elements of accountability. Thus, argumentation or explanations may be made or given in different forms, as long as they are coherent. Or justification may have different levels of depth.
Moreover, the lines are blurred between what may be considered a system for monitoring that the goals of government activity have been met, focusing merely on tracking, and accountability itself, which includes elements of reflection and deliberation. We cannot refer to pure, distinct forms, but rather to a continuum where we can find hybrid systems.

Bovens (2005) defines the elements of accountability, making it possible to check whether an exercise complies with these standards:

- It must be public.
- Explanation and justification of conduct are essential aspects, different from propaganda or giving general information to the public.
- Explanations must be addressed to a particular forum or group of actors.
- Actors accounting for their actions must feel under the obligation to do so; it cannot be at their discretion.
- Possibility of debating and judging actions.

Accountability can be horizontal, when it occurs between separate spheres or powers, which have the legal standing to exercise different actions ranging from oversight to criminal penalties. This is the case of the Court of Auditors, or of agencies that are independent with regard to the executive. It can also be vertical, when it occurs between the State itself—or its governing bodies—and citizens or social groups.

Accountability is, at the same time, a structure, a process and a result, as is democracy. It is a structure, inasmuch as it has rules and institutions that are responsible for informing, explaining, and submitting government action to public scrutiny; a process, consisting of specific actions to be held to account; and a result, which are the outputs generated as a result of the process.

However, accountability is not public policy evaluation. Even though both terms are often cited together, and even indiscriminately, they are not synonyms. Accountability “often serves as a conceptual umbrella that covers various other distinct concepts” (Bovens, 2007).

Evaluation is one of the possible accountability instruments, but from a theoretical viewpoint, it has specific, characteristic features. Evaluation involves interpreting and judging evidence; it is action-oriented, because it is closely linked to its purposes and usefulness; and it analyses, using its own criteria, the relevance, internal and external coherence, effectiveness, equity, sustainability, or any other aspect of a public action.
The manner and purpose of addressing accountability is different. It is a result of monitoring; it involves the duty and the obligation to submit information about the activities carried out; and it has a strong component of public visibility, which links it to transparency. Therefore, unlike evaluation, accountability does not include judging the appropriateness, effectiveness, and efficiency of political action; however, it may include occasional references to the results of evaluations carried out as part of government commitments.

Lastly, it should be noted here that implementing and developing accountability processes must also take into account some of the potential negative aspects (which may be the same as those of evaluation), such as overloading the monitoring and performance systems; the accountability paradox, where greater visibility of government action does not necessarily entail better government (Halachmi, 2002 and Dubnick, 2003); and the fact that meeting accountability requirements may not translate into better functioning of public services (Van Thiel and Leeuw, 2003).

3. Comparative experiences

Most countries like ours have structured accountability instruments. Their significance and development have expanded to the extent that, in recent decades, the demand for transparency in government action has increased and, therefore, so has the demand for tools enabling more effective control of this government action. However, we are faced with a variety of cases depending on the different cultures, policies, and structures of States and of governments, which leads to a wide diversity in accountability procedures, the sphere in which they take place, and the institutions promoting them.

As regards accountability systems within the executive itself, a particularly noteworthy example is the experience of the United Kingdom, which structured accountability for the first time in the Prime Minister’s Delivery Unit, aimed at analysing the extent to which a government programme had been achieved; this Unit was, however, eliminated in 2010. In Canada, the Results and Delivery Unit was created in 2016, implementing a monitoring and accountability system that quantified and published the extent to which goals and guidelines had been met, through the Ministerial Mandate Letters. For its part, the USA has a longstanding tradition of strategic planning, monitoring, and accountability, particularly through the White House Office of Management and Budget, which is responsible for promoting and achieving the implementation of government programmes, and for carrying out accountability exercises, in addition to its budget-related tasks.
Noteworthy in Europe is France’s recent creation, in 2019, of the Interministerial Directorate for Public Transformation, reporting to the team of the President of the Republic and of the Prime Minister. This body monitors government transformations, reforms, and planning at the ministerial level. In the case of Italy, there is a Government Programme Office which is part of the Presidency of the Council of Ministers. Its Programme Oversight Service undertakes the duty to monitor the application of the government programme and commitments.

Lastly, in Latin American countries, Colombia has a noteworthy tradition regarding monitoring the extent to which presidential goals are met; there is a National Planning Department, and a Presidential Advisory Office for Compliance Management, both of them reporting to the Presidency of the Government.

In Spain, however, to date there have been no previous nationwide accountability experiences which, promoted by the national Government itself, address all of its actions, using the approach of analysing the extent to which the commitments acquired have been met.
III. THE ACCOUNTABILITY EXERCISE UNDERTAKEN BY THE PRESIDENCY OF THE GOVERNMENT OF SPAIN

1. Background

The Spanish Constitution (Constitución de España, or CE) provides for the representative mandate of Parliament, by affirming that Spain is a parliamentary monarchy (article 1.3 CE) and by effectuating the principle of representative democracy. The Congress of Deputies and the Senate, which jointly constitute the Spanish Parliament, are the “representatives of the Spanish people” (article 66.1 CE), in whom sovereignty is vested (article 1.2 CE). Moreover, Parliament exercises the legislative power of the State, as well as scrutiny over the actions of the Executive (article 66.2 CE). The Spanish electorate are thus both actors and authors of Spanish law, pursuant to Constitutional Court Ruling 241/1990 of 15 February.

The election of the President of the Government is dependent upon a candidate winning the confidence of Parliament, and specifically that of the Congress of Deputies, through the inauguration procedure regulated in article 99 of the Spanish Constitution, whereby the candidate presents their Executive’s political programme; this confidence must be maintained for as long as the candidate remains in office. This confidence-based relationship means that Parliament exercises scrutiny over the actions of the Executive. Parliamentary scrutiny is what makes representative democracy effective, and is an inherent responsibility of all parliaments. To undertake this duty, the Spanish Parliament has recourse to a number of instruments regulated in Title V of the Constitution (e.g., questions, inquiries, and requests for information).

As will be shown in the following sections, the present accountability exercise is a complementary tool to existing instruments of control, both due to its objectives and its subject matter. It thus deepens the direct relationship between the Executive and the electorate, reflecting the current forms of governance appropriate to societies that are increasingly well-qualified, critical, and better informed. And it does so without in any way undermining the crucial role in exercising scrutiny undertaken by the legislative body, and respecting the constitutional framework at all times.

The commitment to accountability referred to herein was thus affirmed by the President of the Government at the press conference held on 14 January 2020, following the first meeting of the Council of Ministers for this term of office:
One new development I would like to share with you is that over the course of these 1,400 days, we will be giving regular account of the advances made in each area, in each ministry, and we also intend to give regular account of the progress made by the new Government in these lines of action [...] sharing the advances made by our country towards each of these five major transformations, and explaining, whenever necessary, the obstacles that we encounter along the way to setting and meeting these objectives.

2. Purpose

The main purpose of this accountability exercise of the Presidency of the Government is to reaffirm the value of promises kept, as a driver of and planning horizon for Government action.

The aim, therefore, is to determine the progress made in keeping the commitments undertaken, as well as to contribute to the Government’s strategic planning.

Moreover, this exercise is also intended to form part of a wider process for strengthening the quality of our democracy. In terms of public governance, the goal is to address the concerns of an electorate that is also increasingly well-informed, critical, and politically engaged, in the conviction that this will strengthen trust in our democratic institutions, through mechanisms and structures that enable the work of public representatives to be evaluated. And as the President of the Government affirmed in his inaugural address, “we must combat the public’s political apathy with clear exercises in transparency, strict control mechanisms, and accountability guarantees.”

In sum, the aim of implementing this system is to strengthen the democratic process, above all through the continuity and consistency of the exercise. Although it could be argued that political scrutiny and accountability are not intrinsic aspects of democratic quality per se, all types of accountability are fundamental to the functioning of a democratic system (O’Donnell, 2004), in particular when accountability acts in conjunction with other mechanisms.

This exercise forms part of an institutional learning process. Such learning is conceived as a process whereby the Government and the different ministries are able to generate knowledge, map and understand their environment, and learn (Hedberg, 1981), while also making changes and adapting to new social, political and institutional paradigms and circumstances. In this regard, there is no doubt that the monitoring on which accountability is based, as well as the debate that it may incite, will enable
improvements to be made to the actions of the Government and of its different ministries, especially in the areas of planning and oversight, contributing highly relevant information on governmental action.

3. Definition

In this exercise, accountability is understood as the process whereby, as promised by the President of the Government, the Presidency of the Government regularly submits the achievement of Government commitments to public scrutiny. The Department of Planning and Monitoring of Governmental Action (hereinafter, DPM), which operates under the aegis of the President of the Government, through the Secretariat-General of his Staff Office, was created for this exact purpose.

This definition encompasses the following elements:

- **Initiative.** This accountability exercise is an initiative of the President of the Government, who, upon taking office, explicitly undertook to give regular account of the advances and progress made by the Government. The accountability process is undertaken by the Staff Office of the Presidency of the Government, and is promoted by the Secretariat-General of the Presidency of the Government, through the DPM, with the active collaboration of all ministries.

- **Subject matter of the accountability exercise.** The accountability exercise will analyse the extent to which the commitments adopted have been met by the Government of Spain and carried out by the General State Administration. This accountability report will also reference the main actions undertaken to manage the pandemic, but for information purposes only; such actions will not be analysed in assessing the achievement of the commitments described herein. No analysis will be conducted of activities undertaken by other actors belonging to the multi-level structure of the Spanish State, such as the regional administrations of Spain’s self-governing Autonomous Communities, and of provincial entities or local institutions.

- **Territorial scope.** The scope encompasses the entire territory of the Spanish State, irrespective of whether the commitments are national or sub-national in nature, or have been adopted in the framework of the EU or an international organization.
Target audience. This accountability report is addressed to the electorate, to Parliament, and to those groups, institutions, and civil society actors with a particular interest in the action of the Government, and its analysis, evaluation, and accountability.

4. Principles

This accountability exercise is founded on the following principles:

- It is **global and shared**, because it encompasses the action of the Government of Spain as a whole and, although it is promoted by the Presidency through the DPM, it draws on information shared by all of the ministries.

- It is **all-encompassing**, seeking to include all the commitments adopted by the President of the Government and by its ministers, from the moment of taking office and over the course of the term.

- It is **dynamic**, as it follows the course of events as they unfold, and aims to monitor the entire life cycle of commitments from adoption to achievement or, where applicable, reformulation or relinquishment, identifying their status at all times, as well as the reasons underlying any changes.

- It has been undertaken with **methodological rigour**, taking as a reference the best international standards and criteria garnered from comparative experiences, critical analyses, and evaluations of accountability systems. Moreover, the design was submitted to the scrutiny of the Analysis Group, which comprises experts of recognized prestige, expertise, and accredited know-how in analysing public policies and accountability, from different universities and academic institutions.

- The monitoring undertaken will sustain the **traceability of commitments** so that their status at any given moment, as well as their evolution over time, can be determined.

- The outcomes will be set forth in an accountability report that will be **public** and accessible to the electorate. Access will also be facilitated to the database of commitments and initiatives, pursuant to the principles of **transparency, open data, and access to information**.

- The exercise will be carried out on a **continuous** basis over the course of the entire term of office, and progress reports on the achievement of commitments will be published **periodically**, foreseeably every six months, together with details regarding the data used (commitments and initiatives), in addition to other information considered relevant.
Efforts will be made to keep the transaction costs of obtaining the information low. Requests for information from the ministries and public bodies regarding commitments and the initiatives undertaken to meet them must not be excessive, nor represent high costs for these bodies at management level (monitoring overload), or in terms of time and energy. This shall be one of the principal responsibilities of the DPM.

External verification formulas will be sought for the accountability exercise, to guarantee that the methodology designed has been duly and rigorously applied in achieving the outcomes contained in the published reports.

This exercise will be submitted to the scrutiny of the electorate. To this end, different activities and forums will be organized over the course of the term to ensure that both the electorate as a whole, and the most representative actors and stakeholders, can attain in-depth knowledge of and debate the reports presented.

Efforts will be made to mitigate the ratchet effect. This effect, in general, entails a perverse incentive whereby targets or commitments are curbed so that performance indicators are higher or more favourable, either by lowering targets or by omitting any new commitments that have been undertaken. This effect usually refers to not increasing the targets for a given year with respect to those of the previous year; it is mitigated by continually incorporating any new commitments adopted, as well as individually substantiating and identifying the reasons for any goals having been relinquished.

Efforts will also be made to avoid the gaming effect, or manipulation of the outcomes attained. Typically, any accountability system in which the attainment of outcomes is linked to positive or negative incentives for those tasked with implementing or managing the corresponding activities can cause the units responsible to modify their conduct or tamper with the actual outcomes achieved. This accountability system includes symbolic and reputational incentives and penalties.

Finally, as shown in the following sections, both due to its goals and its subject matter, this accountability exercise constitutes a tool that is complementary to the existing instruments of control over the actions of the Executive.
5. Methodology

5.1. Work system

The system adopted to structure the accountability exercise was as follows:

- Establish the theoretical framework by analysing comparative experiences and the possible ways of fitting the accountability exercise into Spain’s constitutional and administrative framework.

- Determine the subject matter of the accountability exercise. In this regard, it was considered that the programme to be implemented by the Government would be that presented in the inaugural address of the then candidate for the Presidency of the Government, extended by the additional content of the agreements formalized with political groups that made the positive outcome of that vote possible. In addition, the subject matter of this exercise also encompasses those commitments formally undertaken by ministers when addressing Parliament, in presenting the strategic lines of action of the policies of their respective ministries.

- Design and implement the methodological processes and tools to undertake the monitoring, always with a view to institutional learning and continual improvement, so as to strengthen the system in a way that is compatible with the continuity (and comparability) of the analysis over the course of the entire term.

This work gives rise to the definition of the following sequence of methodological processes, which will be analysed in detail in subsequent sections:

- Identify and systematize the commitments adopted upon taking office.

- Establish the manner in which new commitments will be adopted, or existing commitments redefined or relinquished, as applicable.

- Study the actions of and public decisions adopted by the President of the Government and its ministers, to assess how they are linked to these commitments and thus be able to determine the current status of the latter.

- Include the national objectives set by the President of the Government, and monitor their evolution, to be able to categorize the commitments and initiatives and adapt the accountability exercise to the Government’s lines of action.
Publicize the accountability exercise, using formats adapted to its different audiences. This dissemination will address the outcomes of the exercise and the data on individual commitments, the initiatives implemented to meet them, and a set of variables enabling their analysis.

5.2. Commitment analysis

5.2.1. What is a commitment?

Generally speaking, a commitment could be defined as an expression of the will to carry out an initiative, or a set of initiatives, in order to address a need or solve a problem, creating an expectation for third parties. Therefore, it means taking on an obligation.

Using this definition as a starting point, for the purposes of this accountability exercise, a commitment is any statement, obligation, promise, or declaration expressly made by the Government to respond to a specific public need or problem and, to a certain degree, to convey the will to transform reality. A commitment, therefore, generates an expectation for third parties, and in return, a responsibility and obligation to respond, materialized in a formal process in which actions may be judged on the basis of specific performance standards.

However, the announcement of actions, measures, plans, programmes, or strategies to be carried out as part of the ordinary activity or management of ministries or bodies attached thereto is not considered a commitment, when they do not involve the will to effect change that is intrinsic to Government action.

5.2.2. Where do commitments they come from?

Commitments may come from different sources: the President of the Government’s inaugural address; the Coalition Agreement for a Progressive Government formalized between PSOE and Unidas Podemos; the agreements formalized between PSOE and other political groups that voted in favour of the coalition government, or other agreements of a similar nature that may be subsequently formalized; and public addresses by the President of the Government and its ministers in Parliament, as well as public declarations made by them.
In all of these cases, an accurate and specific source of verification, either oral or written, is necessary to determine whether something should be considered a commitment.

5.2.3. Updating commitments

Reality is dynamic, not static, and so are public needs and problems. Therefore, the Government’s actions and its capacity to respond to new challenges require updating its commitments, incorporating new targets and lines of action in addition to the promises made at the beginning of the Government’s term of office. A tangible example of this is Covid-19, which has led to government action in every sphere: The Government undertook new commitments to respond to the consequences of the pandemic and to mitigate its effects, mostly its social and economic impact.

This dynamic nature of government action involves:

- **The need to incorporate new commitments.** For this to happen, commitments must be expressly formulated and verifiable, which requires that they be included in a written agreement or public declaration.

- A certain period of time also needs to have passed between the formulation of the commitment and the materialization of the initiative. Therefore, the announcement that something is going to be done imminently cannot be considered a new commitment.

- This distinction can be seen clearly, for example, when analysing the Covid-19 pandemic. The health, social, and economic crisis that began in March 2020 compelled the Government to implement, at the very beginning, a variety of specific measures to address an unexpected situation. The information given about the implementation of these actions was not preceded by a commitment, in the terms defined in the present exercise. However, in the nine months since then, the Government has expressed its will to address, in the short, medium and long term, the problems and needs that have emerged, or which have been created *ex novo*, as a consequence of the pandemic. These can be considered new commitments, and the related initiatives may be analysed in terms of performance.

- The December 2020 report incorporates the new commitments formulated in the period between January and December 2020, provided that they are in line with the definition of commitment, that they have been identified by the DPS or the ministries, and that both have verified the need to incorporate them. They must also be fully identifiable.
• **Synthesizing existing commitments.** Exceptionally, and in very specific circumstances, it may be necessary to synthesize commitments, for two main reasons:
  
  - because there are duplicates, or
  
  - because new, broader commitments have appeared, encompassing previous commitments that had a narrower scope (e.g., “promoting” a public policy sphere may be subsequently reformulated as approving a strategy aimed at achieving results in that public policy sphere).

  Commitments that have been synthesized will be identified in an appendix, which will include the reason for their modification.

In any case, the fulfilment of a specific commitment will not automatically generate other, related commitments. For instance, meeting the commitment to “create the Just Transition Institute” will not mean that the exercise of the duties or authority assigned to this new Institute will become a new commitment; and “approve a Strategy for the Demographic Challenge” will not mean that, after approval, all of its goals will be incorporated as new commitments.

This exercise incorporates the traceability of all commitments, enabling the clear identification of new commitments and of those that have been modified, so as to determine when they were created or incorporated into the accountability exercise, what their status is at any given time, when they have been met, whether they have been synthesized because they were duplicates or they were subsumed into a broader commitment, and, where appropriate, when they have been relinquished. Doing so will guarantee the integrity of the information and the possibility of detailed monitoring and analysis.
5.2.4. Classifications used

As shown above, commitments vary greatly as regards their source, content, characteristics, and degree of complexity, which has an impact on their possible classification and on how ministries must act in order to meet them.

For the purposes of this accountability exercise, the following classification parameters have been considered the most interesting to address:

- The nature of the commitment, because this facilitates performance analysis.
- The origin or source of the commitments, because this makes it possible to obtain partial results.
- The territorial scope, because this enables analysis of the central Government’s actions in Spain’s different territorial levels.

Thus, depending on their nature, we can distinguish between specific commitments and commitments for ongoing action:

- Specific commitments clearly define the initiative that must be carried out, or the final target to be reached; this, in turn, enables us to distinguish between output commitments and outcome commitments:
  - Output commitments, therefore, are aimed at producing legislation or plans (and, thus, are regulatory), or projects, infrastructure, etc. They contribute to achieving a result, although in themselves they do not guarantee results.

Examples: develop a network of forward-looking classrooms, establish a delegated committee for the 2030 Agenda for Sustainable Development, or approve a new regulation for State-owned museums.
Outcome commitments require the achievement of a specific goal or a goal that may be measured quantitatively with regard to the previous situation. In this regard it must be noted that the Organisation for Economic Co-operation and Development (OECD) defines outcomes as “the likely or achieved short-term and medium-term change and effects of intervention outputs” (OECD, 2010).

Examples: increase by 20% the limit of the amount allocated for projects considered difficult audiovisual works, going from 40% to 60%; continue
to bring the wages of the National Police and of the Civil Guard to equal levels; intensify Labour Inspectorate actions regarding working hours and the irregular economy.

- Ongoing action commitments set more abstract goals, without identifying the specific result aimed for, or how it is to be achieved; they require steady action over time.

Examples: improve employment policies, dedicate particular attention to the most vulnerable, work to make Africa an EU priority, protect the welfare state.

Depending on the origin or source of the commitments, as stated in section 5.2.2. above, there are five types of commitments:

- The President of the Government’s inaugural address.
- The Coalition Agreement for a Progressive Government formalized between PSOE and Unidas Podemos, and the agreements formalized between PSOE and other political groups to attain the sufficient majority in support for the coalition Government (ERC, PNV, Compromís, Nueva Canarias, BNG and Teruel Existe), as well as any other agreements of an analogous nature that may be formalized in the course of the term of Parliament.
- Public statements or declarations made by the President of the Government or by its ministers. These include the first addresses by the ministers to the Congress of Deputies or to the Senate, as the case may be, explaining the strategic lines of their ministry, and other addresses delivered at institutional or informal forums throughout their term of office.

Depending on their territorial scope, commitments may be international, EU-related, national, regional, or provincial.

An additional classification is based on the strategic lines of action of the Recovery, Transformation and Resilience Plan presented by the President of the Government: a green Spain, a digital Spain, a gender gap-free Spain, and a cohesive and inclusive Spain. Should these lines be modified, the report will preserve, as far as possible, the previous thematic classification and the lines included in the President of the Government’s inaugural address, so as to enable the comparability and continuity of the analysis.
5.3. Initiatives

5.3.1. What is an initiative?

An *initiative* is any public measure, action, or decision that launches a process or mobilizes resources (human, budgetary, material, or organizational) aimed at addressing a public need or problem, whether involving citizens, institutions, the environment, or any other subject or object that may benefit from government action.

This includes working on, or approving, a single action or a plan, a strategy, a Bill, or any other instrument that may mobilize the aforementioned resources.

5.3.2. What are the sources of verification of initiatives?

Given that initiatives stem from the dynamic action of all the members of the Government, and that their nature is diverse, there is no single source of initiatives as such, where we can find every action and decision adopted.

Therefore, to find the initiatives carried out by the Government, it is necessary to consult different public information channels:

- Formal: references from meetings of the Council of Ministers, and the Official State Gazette (BOE).
- Informative: press releases on official websites, and publications uploaded to official accounts on social networks.

The information obtained from these sources is checked against the different Ministries, because the accountability exercise carried out by the DPS is not one-way but two-way, and is shared with all the ministries. This means that in addition to the DPS monitoring, the ministries are asked to review the initiatives identified, to explain them, to add any necessary nuance, and to supplement them with others that have not been made public, so as to have an overview of all actions linked to commitments.

Thus, every initiative identified must have at least one specific source of verification that corroborates its existence, as well as its internal coherence with regard to the commitment and the progress made towards meeting it, as stated in the accountability report (see section 5.4.2). And in those cases in which the initiative does not have a public dimension (because it is part of the ministry’s internal work, drafts, meetings, etc.), this circumstance is expressly indicated.
5.3.3. Territorial breakdown of initiatives

Given that the accountability exercise aims to bring government action closer to the citizenry, one of the goals of this report is to break down by territories the information obtained. Thus, it not only presents nationwide advances made as regards commitments, but also the advances made in each Autonomous Community, and if possible, in each province, in a multilevel context, with full respect for the division of authority set forth in the Spanish Constitution and in the Statutes of Autonomy of Spain’s Autonomous Communities.

Therefore, the organization of the initiatives underscores their territorial scope, distinguishing among:

- **International initiatives**: those implemented outside Spain’s and the EU’s borders (e.g., investment in a cooperation project, or collaboration with countries of transit to address migration).

- **European Union initiatives**: those implemented in the framework of the European Union (e.g., negotiations regarding the CAP).

- **National initiatives**:  
  - **Initiatives that can be broken down by territory**: those implemented for the entire country, but whose actions can be analysed in a disaggregated manner because they lead to outputs or outcomes at the territorial level (e.g., the minimum income scheme, or the implementation of the Ministry of the Interior’s VioGén system, a comprehensive monitoring system for gender violence).
  
  - **Initiatives that cannot be broken down by territory**: those implemented for the entire country, but whose actions cannot be analysed in a disaggregated manner (e.g., the Climate Change Act, or the Act creating a financial sandbox).

- **Subnational initiatives**: those initiatives which, due to their nature, are implemented in one or more of Spain’s 17 Autonomous Communities, or in a province (e.g., repairing a road, or awarding a grant for emergency assistance in a specific area).

Thanks to this classification, work is being done to ensure that accountability is provided in a standardized and coherent manner, but also specifically, in Spain’s 50 provinces and two Autonomous Cities, thus making it possible to analyse progress regarding commitments from a territorial perspective.
5.4. Meeting commitments

Analysing whether commitments have been met consists of determining the extent to which the promised outputs, outcomes, or ongoing actions have been achieved.

The following figure reflects the process determining the extent to which a commitment has been met.

**Figure 2. Commitment process**

5.4.1. Relationship between initiatives and commitments

An initiative is understood to *activate* a commitment when it launches the process or *chain of initiatives* that may, in time, make it possible to obtain that output, outcome, or set of ongoing actions.

In certain cases, the number of actions, phases or processes leading to the generation of outputs or outcomes may be small (e.g., the renovation of a *parador de turismo*, a kind of State-owned hotel). However, meeting other commitments will require a more complex deployment of resources and activities (this is, for example, the case of “work to achieve low-emission mobility and reduce air and noise pollution” or of “protect the welfare state”). Indeed, given the wide variety of commitments undertaken, meeting them may require carrying out a single initiative or a number of different but related initiatives, because the ultimate goal is to meet expectations.
The opposite may also occur. An initiative may have effects on more than one commitment, either because they are related (e.g., a Bill amending the Workers’ Statute would make it possible to meet several commitments, such as limiting subcontracting and the use of temporary contracts, restoring the priority to apply the company agreement, and combating the use of fraudulent part-time contracts), or because the initiative involves acting in different public policy dimensions or sectors (e.g., a Royal Decree-Law on urgent measures regarding the environment, culture and housing, comprising connected or unconnected measures in each of these areas).

5.4.2. Status of commitments

There are three possible options regarding the status of each commitment: activated, not activated and relinquished:

- Commitments are not activated when, as yet, no initiative has been undertaken to fulfil them.
- However, they become activated when initiatives have been implemented to fulfil them. This, in turn, will determine whether they are underway, or have been completed, and, therefore, met.
- Lastly, commitments are relinquished when the Government expressly rules them out.

Not activated, underway and met are mutually exclusive categories; a commitment cannot have more than one status at the same time.
Determining the criteria that define these different statuses is undoubtedly crucial for the accountability exercise regarding government activity carried out by the DPS. That is why we will now analyse the sequence in greater detail.

5.4.3. Commitments underway

A commitment is considered *underway* when and initiative has begun or is being carried out to further or to achieve it in the future. That is to say, when activities are being carried out or measures have been implemented leading to the generation of a planned output, outcome, or ongoing action.

The wide variety of commitments and initiatives makes it difficult to establish a common sequence for the process that is sufficiently consistent with the nature and characteristics of each commitment. However, to reflect the progress and dynamism of government action, several stages have been identified, ranging from a commitment that has not been activated to a commitment that has been completed or met:

- **Underway - with advances:** when, in the six-month period of reference, activities or initiatives have been carried out showing progress towards meeting the commitment.

- **Underway - without advances:** when no activities have been carried out in the six-month period of reference, even if some have been carried out in the past.

- **In the hands of third parties:** when in principle, the action required to further or to achieve the commitment is no longer solely the responsibility of the Government, because a specific milestone or procedure falls outside the scope of its duties and authority. Although the Government has mechanisms of coordination, negotiation, or to enable majorities to be formed, meeting such a commitment no longer depends exclusively on the Government.

This is the case, for example, with commitments consisting in the approval of an Act of Parliament, which inexorably require the participation of Parliament. In such cases, a commitment cannot be considered completed when the Government approves the Bill, because citizens’ expectations have not been met. But formally, the achievement of that goal cannot be solely attributed to the Government, but, rather, is mainly the responsibility of other institutional spheres.
5.4.4. Commitments met

The decision regarding when to consider that the Government has met a commitment is, understandably, another one of the Gordian knots of the accountability exercise.

Intuitively, everyone has an approximate idea of when a commitment is met. However, when we analyse each commitment on a case-by-case basis, we see nuances that complicate their study. For instance, where do we set the finish line for commitments like “strengthen the welfare state”, “protect people who have mortgages”, or “make Africa a priority for the European Union”?

To answer this question, it is important to remember that accountability is the result of planning and monitoring, and does not, therefore, constitute an evaluation, at least in the terms most often used in public policy analysis. Consequently, the aim is not to evaluate the effectiveness of the initiatives adopted, as stated above. Quite the opposite, because this exercise is on a different level, namely: It aims to determine whether the initiatives adopted can be interpreted in the framework of the commitments undertaken and, therefore, enable the Government to confirm that it has kept its word.

The key lies in drawing the finish line. To this end, and given the above-mentioned wide variety of commitments, specific criteria have been established depending on whether commitments are specific or involve ongoing action:

- As explained in section 5.2.4 above, specific commitments identify a perfectly defined output or outcome clearly, directly, and unequivocally. Therefore, they will be considered met or completed precisely when their stated output or outcome has been obtained.
  
  For this to occur, the Government must have done everything within its authority to advance towards that achievement, and, moreover, the process itself must have been completed, regardless of whether the Government is responsible for the final phases.

  For example, “approve a Strategy for the Demographic Challenge” will be considered met when the Government makes the corresponding decision at the Council of Ministers meeting, whereas “approve the Euthanasia Act” will not be completed until the Act is published in the BOE, following its enactment by Parliament.

- Ongoing action commitments are those that have been formulated in a more abstract or aspirational manner, and require sustained action over time. The problem they pose is that they do not set a specific, measurable target.
Therefore, to bring them down to earth, it has been decided that they will be considered met when relevant initiatives have been carried out aimed at achieving those vaguely defined goals. Otherwise, citizens would have the mistaken impression that, despite the efforts made, the Government is either not meeting its commitments, or is undertaking unattainable commitments, and this could be a disincentive to setting long-term goals.

Consequently, the following finishing lines have been established for considering an ongoing action commitment as achieved:

- When it is interpreted that the measures and actions implemented have modified the starting point by sufficient terms or a sufficient magnitude to consider that the public problem or need has been addressed by the Government, and, therefore, that it would not be strictly necessary to carry out further actions in this regard.

Thus, for instance, the commitment to “foster vocational training and update the content of current qualifications and traditional occupations” will be considered met when, over a sustained period of time, the contents of several qualifications have been modified, and investments to improve vocational training have been made.

- In the case of commitments that refer to an activity involving promotion, preservation, maintenance, fostering, or advancing, such commitments will be considered met when the earmarked budget has been executed, and sufficient promotional activities, events, contracts, agreements, or any other usual activities have been carried out.

For instance, the commitment to “preserve and promote historical heritage” will be considered met when the budget allocations have been executed, the scheduled work contracts have been carried out, or the necessary agreements have been signed, in the appropriate terms for the preservation of certain assets forming part of historical heritage.

- Those commitments which, having been expressed in somewhat abstract terms, prove difficult or impossible to meet in a strictly literal sense, shall be understood to have been met if each ministry undertakes its specific duties and responsibilities in such a way that progress is made towards achieving the goals or targets set in each one.

For example, the commitment to “work to make Africa an EU priority” can be considered to have been met due to the actions undertaken by the pertinent ministries (attending meetings of EU institutions, travelling to African countries, drafting proposals, etc.).
In all cases, a commitment can only be considered to have been met if the initiatives adopted are fit for purpose; ordinary and/or management activities are insufficient. It is, therefore, essential that actions be aimed at transforming the current situation, whether quantitatively or qualitatively.

Once considered to have been met, the status of ongoing action commitments will not be changed unless there is a clear deterioration in the problem or initial situation, or there is a marked decline in the activity of the unit responsible for the commitment. The evolution of commitments met will be monitored, in particular in the case of ongoing commitments.

Irrespective of these criteria, the same or different actions may be developed or built upon in the future to continue reducing the problem or improving the initial situation.

5.4.5. Relinquished commitments

A commitment will be understood to have been relinquished when the Government has expressly decided not to pursue it, whether due to a change in priorities, or because it has been invalidated by an international agreement.

5.4.6. The impact of General State Budgets on meeting commitments

Finally, given the significance of the General State Budgets as a core instrument of the Government’s actions, it makes sense to end this section on methodological bases with a brief explanation of the impact these budgets are considered to have on meeting commitments.

A commitment can be considered to have been activated when a specific General State Budget item has been allocated to it, as this reflects a public, quantified, and definite intention to implement it within a set framework, at least a financial one. Similarly, if a commitment is underway, the allocation of a budget item indicates that the ministries are continuing to make provisions for it; in this case, financially. Therefore, in both cases, the commitment will be categorized as underway – with advances, and will be considered to have been met when the item is effectively applied.
However, when the commitment itself consists entirely in making a budget allocation, it will be considered to have been met when the General State Budget includes the stipulated amount or increase.

5.5. Preparing the accountability report

5.5.1. How the achievement of commitments is reflected in the accountability exercise

Once the commitments have been identified, the initiatives monitored, and the achievement of commitments assessed, the next step of the exercise consists in analysing the information obtained and presenting it in an accountability report for public disclosure, together with a set of appendices containing supplementary information.

The structure of this report necessarily reflects the questions raised over the course of the work carried out:

- It addresses, from a quantitative perspective, the extent to which the commitments adopted by the Government have been met. Future reports will include two scores, or percentages, reflecting the extent to which commitments have been met, given that commitments are dynamic and new commitments will be adopted:
  - The reference or baseline for calculating the first percentage will be the commitments made by the Government upon taking office; i.e., those included in the inaugural address given by the President of the Government and in the programme agreements formalized with other political groups, and the commitments made by the ministers when first addressing the Congress of Deputies or the Senate. The degree to which commitments have been met (number of commitments met out of the total number of commitments made at the beginning of the term) will be analysed as at the reporting date.
  - The reference for the second percentage will be the total number of commitments made as at the previous reporting date (i.e., those made upon taking office plus any additional commitments adopted over the course of the term). This reference will be used to calculate the percentage of commitments met out of the total number of commitments made.
Each future report will also present the outcome of the corresponding update as at its reporting date, to facilitate this second calculation in the next accountability exercise.

Moreover, a third percentage will be calculated to reflect any unmet commitments for which the Government has already done everything within its power, and which are now in the hands of other bodies or institutions (commitments in the hands of third parties out of the total number of commitments).

Thus, any report published at the same time that the General State Budget is submitted to Parliament will analyse the outcome of the Budget, if approved, as regards the Government’s commitments. Specifically, it will assess how many commitments are to be activated, advanced, or even met due to the inclusion of specific budget items.

The report will also specify the percentage of commitments underway, calculated out of the total number of commitments, and their different categorizations (without advances, with advances, and in the hands of third parties).

The report will also include an analysis by strategic line of action to show the extent to which the Government’s actions are in line with the country’s main goals, depending on the discourse adopted by the President of the Government at any given time.

It will also include a disaggregated analysis of the Government’s actions at the territorial level, by Autonomous Community and by Autonomous City.

Finally, the accountability exercise includes forecasting the percentage of commitments that will be met over the next six months. This forecast is based on the information initially provided by the ministries on the current status of commitments, and how they expect them to evolve over the next six months.

5.5.2. Report structure

The assessment report includes the following sections:

- An executive summary, setting out the main conclusions.
- Commitment outputs, together with the most significant commitments.

The methodological bases of the accountability exercise are to be attached as an appendix to the report, as are the conclusions and recommendations made by the Methodological Analysis Group.
5.5.3. Public disclosure

The accountability report is made public to ensure that its content reaches its target audience—the citizenry—because this is the exact purpose of the exercise: to make it easier for people to learn about the Government’s actions, and to publicize the extent to which the commitments made by the Executive have been met.

Additionally, mechanisms will be implemented for the outcomes obtained to be presented to and discussed with civil society agents and groups with a particular interest in good governance and accountability. The data disclosed will be disaggregated to enable more in-depth knowledge and analysis of the account given of the Government’s actions.

5.5.4. Procedure

The President of the Government will submit the accountability report to the Council of Ministers before publicly presenting it at a press conference. The report will be published on the website of the Presidency of the Government, where a downloadable file with open data on the commitments met will also be made available. By decision of the President of the Government, the outcomes of the accountability exercise, and the text of the report will be made known to the General Committee of Secretaries of State and Under-Secretaries by the Secretary-General before the report is submitted to the Council of Ministers.
IV. BIBLIOGRAPHY


Part II

DELIBERATIONS OF THE

METHODOLOGICAL ANALYSIS GROUP
I. INTRODUCTION

The Staff Office of the Presidency of the Government has implemented an accountability exercise as an instrument for reaffirming the value of promises kept, with a dual purpose: informing the public on the progress made in meeting the total volume of commitments adopted by the Government, and explaining any changes in commitments over time (i.e., how and why new commitments are adopted, existing commitments are reformulated and, where applicable, certain commitments are relinquished, over the course of the term).

This project derives from the challenge expressed by the President of the Government in the inaugural address given on 5 January 2020, in the following terms:

*We must combat the public’s political apathy with clear exercises in transparency, strict control mechanisms, and accountability guarantees.*

On 14 January 2020, at the press conference following the first meeting of the Council of Ministers for this term of office, the President of the Government added that:

*One new development I would like to share with you is that over the course of these 1,400 days, we will be giving regular account of the advances made in each area, in each ministry, and we also intend to give regular account of the progress made by the new Government in these lines of action. And we are going to do it every 100 days, sharing the advances made by our country towards each of these five major transformations, and explaining, whenever necessary, the obstacles that we encounter along the way to setting and achieving these objectives.*

For the purpose of designing, coordinating, and undertaking this project, Royal Decree 136/2020 of 27 January, regulating the restructuring of the Presidency of the Government, provided for the creation of the Department of Planning and Monitoring of Governmental Action (hereinafter, DPM), under the aegis of the Secretariat-General, which shall be responsible “for preparing the information and mechanisms necessary to give account of the Government’s actions” (article 8.1).

In order to undertake these duties, the DPM has developed a methodology for identifying and categorizing the commitments adopted by the Government, and, in
MEETING OUR COMMITMENTS

turn, the initiatives implemented by the different ministries, thus enabling the monitoring of the progress made towards meeting the commitments adopted.

II. METHODOLOGICAL ANALYSIS: ORIGIN, PURPOSE, AND SCOPE

As affirmed by the President of the Government in his inaugural address, his intention is not only to give account of the Government’s actions to the public, but also to do so with the utmost guarantees. To this end, the DPM is engaged in an ongoing improvement process to strengthen the methodology used and facilitate external verification.

This is the context that gave rise to the creation of an independent Methodological Analysis Group (hereinafter, the Analysis Group), comprising experts from public universities asked to study and reflect on the methodology used by the DPM.

Essentially, the objective is to submit the accountability methodology designed by the DPM to scrutiny and analysis, to ensure that it is equipped with the utmost internal coherence and rigour, including the best standards or criteria required to underpin the work, and to make it reliable, objective, and externally verifiable.

To this end, the designated experts analysed the documents and explanations provided by the DPM regarding the methodological foundations and procedural bases designed and implemented to prepare the December 2020 Accountability Report of the Presidency of the Government. This analysis focused, in particular, on the objectives, principles, procedures, system, and tools used.

III. MEMBERS OF THE METHODOLOGICAL ANALYSIS GROUP

1. Eligibility criteria

The members of the Analysis Group were selected applying the following criteria:

- Active members of the university community.
- Excellent academic, teaching, and research credentials in their specialization.
- Specialization in the analysis, monitoring, and evaluation of public policies, or other related areas, to include different perspectives from which to approach the accountability exercise.
- Gender balance.
Territorial diversity among the universities of origin.

The academics selected on the basis of these criteria were sent details of the project and invited to participate. The Methodological Analysis Group was thus created.

2. Members

- Ismael Blanco-Fillola
  Director of the Institute of Government and Public Policy (IGOP). Professor, Department of Political Science and Public Law, Autonomous University of Barcelona

- María Bustelo Ruesta
  Professor of Political Science and Administration, Complutense University of Madrid

- Cristina Elías Méndez
  Professor of Constitutional Law, National Distance Education University (UNED)

- Daniel Innerarity Grau
  Chair in Political Philosophy, Ikerbasque Research Fellow, University of the Basque Country; Visiting Professor, European University Institute (Florence)

- Javier Lorenzo Rodríguez
  Professor of Political Science, Carlos III University (Madrid)

- Cristina Monge Lasierra
  Professor of Sociology, University of Zaragoza

- Carles Ramió Matas
  Chair in Political Science and Administration, Pompeu Fabra University (Barcelona)
IV. PRINCIPLES APPLICABLE TO THE ANALYSIS GROUP’S WORK

(i) Each member of the Analysis Group shall contribute their proven experience to the study of the methodology designed by the DPM for the accountability exercise, applying the utmost academic rigour.

(ii) The DPM shall provide the Analysis Group with any documentation and explanations that it may require. Any processing of this information shall be confidential, and said information may not be disclosed to third parties outside the scope of the Analysis Group.

(iii) On concluding its analysis, the Analysis Group shall issue an outcomes document (conclusions and/or recommendations), which may be attached as an appendix to the Accountability Report prepared by the DPM.

(iv) The Analysis Group shall authorize the possible public dissemination, by the Presidency of the Government, of this collaboration.

(v) Beyond possible reimbursement of any travel or other substantiated expenses incurred to carry out the work, no financial consideration shall be offered for participating in the Analysis Group.
V. PROPOSED WORK DYNAMIC

The Analysis Group and the DPM established a consensus-based work approach to enable the objectives and deadlines to be met.

The DPM made the following proposal on a preliminary basis, to be analysed and debated at the first meeting with the Analysis Group.

- If possible, a schedule of meetings and deadlines should be established at the outset for the entire exercise.
- This schedule should also include the topic to be debated at each meeting. In all cases:
  - Meetings between the Analysis Group and the DPM should preferentially be held online.
  - The DPM shall provide the documentation required for each debate ahead of the corresponding meeting.
- Having completed the work, the Analysis Group shall deliver a single document to the DPM, setting forth the conclusions of the study and possible recommendations for strengthening the methodology for future accountability exercises.
- If the conclusions are not unanimous, the document should also reflect the different members’ perspectives.
- The members of the Analysis Group may designate a coordinator to organize the internal work and serve as a main point of contact with the DPM.
- The DPM shall provide the Analysis Group with a document containing the content of the explanations given and debates held at each meeting. These minutes should be sent prior to the following meeting for analysis, rectification and, where applicable, validation by the Analysis Group.

The commitment adopted by the DPM with each member, as well as with the Analysis Group as a whole, is to promote and respect their utmost freedom and autonomy in undertaking the work, as well as in formulating the corresponding conclusions and/or recommendations.
VI. DEADLINES AND PROVISIONAL TIMELINE

The deadline for finishing work related to the first accountability exercise was 15 December 2020. Therefore, the following schedule was adopted:

- 20 November, 12:30: inaugural meeting of the Analysis Group.
- 27 November, from 13:00 to 14:30: analysis of the general framework and Commitments.
- 4 December, from 13:00 to 14:30: analysis of Initiatives and Achievement.
- 11 December, from 13:00 to 14:30: presentation of conclusions and recommendations, and final debate.

The Monday before each meeting, the DPM provided the necessary documentation for the corresponding methodological analysis. Where additional information was required, the Analysis Group was asked to request it as far ahead of the next meeting as possible.

The aforementioned criteria and dynamics (sections I-VI) were approved by the members of the Analysis Group at its inaugural meeting.
VII. OUTCOMES OF THE METHODOLOGICAL ANALYSIS

The main recommendations made by the Analysis Group are summarized below. These recommendations, which derive from the Group’s methodological analysis rather than any verification activities, are the outcome of the four debate sessions held by the Group. A distinction has been drawn between those recommendations that were incorporated into the methodological bases for the December 2020 accountability exercise, and those that will be considered for subsequent exercises. In the latter case, the observations and recommendations made have been listed irrespective of the degree of consensus reached within the Group. The recommendations made have not been classed or assessed by level of significance.

A. ANALYSIS GROUP RECOMMENDATIONS INCLUDED IN THE METHODOLOGICAL BASES FOR THE DECEMBER 2020 EXERCISE

- Describe the constitutional context of the exercise, and the relationship between the legislative and executive bodies.
- Indicate the complementarity between the accountability exercise and other formally established mechanisms for monitoring the Government’s actions.
- Link the exercise to the concept of public governance.
- Refer to the territorially diverse and multi-level nature of the State.
- Emphasize the value of the innovative nature of the exercise, given that no such exercise has been promoted previously in Spain by the Government itself.
- Specify how the exercise fits into the framework of accountability mechanisms, and detail how it differs from an evaluation of public policies.
- Define the concept of accountability and its different dimensions in greater detail, incorporating the material, subjective, and territorial scope. In addition, place particular emphasis on the target audience of the accountability report.
- Highlight the implicit symbolic and/or reputational penalties that could result from the exercise.
- Highlight that the exercise contributes to institutional learning.
- Clarify the differences between the work of the Analysis Group and the external verification process.
- Incorporate the concept of open data into the principles of the exercise.
- Specify that the accountability exercise will be repeated on a regular basis.
MEETING OUR COMMITMENTS

- Define the purpose of the exercise in greater detail.
- Add a specific section detailing the work procedure followed, including the public dissemination of the report.
- Expand upon the explanation regarding the adoption of new commitments.
- Highlight the traceability of commitments, in particular of new and relinquished commitments, and maintain, as far as possible, prior classifications by subject area.
- Systematize, in detail, the classification of commitments by nature, origin, territorial scope, and strategic line of action.
- Redefine the commitments, depending on their nature, as specific or as ongoing action commitments.
- Specify the need for initiatives to be substantive in nature, and exclude those initiatives linked to ministries’ ordinary duties, as well as all those not aimed at meeting commitments.
- Specify the numerators and denominators for the percentage of commitments met, and detail the indicator for commitments towards which progress has been made.
- Change the term “dependent on third parties” to “in the hands of third parties”.
- Expand upon the information regarding the provision of mechanisms for disseminating the accountability report.
- Refer to the Analysis Group’s work, to the fact that a substantial proportion of its recommendations have already been incorporated, and that those not yet included will be considered for later accountability exercises.

B. ANALYSIS GROUP RECOMMENDATIONS TO BE CONSIDERED FOR SUBSEQUENT EXERCISES

- Once the accountability exercise of the Presidency of the Government of Spain has been defined, provide greater detail on the context of this exercise in terms of comparative international experience.
- Classify the commitments into different priority/hierarchical levels, taking into account the large number of commitments adopted, and that they are not all equally important.
• Synthesize the names given to those commitments that relate to the same or similar issues, or cover similar issues, e.g., approval of an Act/ Bill/ Draft Bill, etc.

• Consider including a “procedural” category in the categorization of commitments by their nature.

• Consider the possibility of limiting the subject matter of the accountability exercise to those commitments that have been formally undertaken.

• Consider the future option of evaluating the effects or outcomes of particularly emblematic or high-priority commitments.

• Align commitments with the 2030 Agenda.

• Define the scope of the exercise as regards state-owned enterprises.

• Provide greater detail on other dimensions of analysis, such as efficiency, or the actors involved in meeting commitments.

• Consider removing sources of verification of an informative nature, such as ministry press releases.

• Detail the measures to be adopted to publicize, disseminate, and raise awareness about the exercise.

• Examine the possibility of creating circular, less hierarchical, information systems. Establish a public data register where the citizenry can verify what has been done and what has not.

• Specify the expenses incurred to undertake the accountability exercise, both by the DPM and by the ministries.